

DEPARTMENT OF ENVIRONMENTAL QUALITY

DIVISION OF SOLID AND HAZARDOUS WASTE

FY 2006 GOALS

May 10, 2006

ENVIRONMENT

DSHW STRATEGIC GOAL:

Protect human health and the environment by promoting pollution prevention and ensuring safe waste management through the proper handling, transportation, recycling, treatment, storage and disposal of solid and hazardous wastes, used oil, and waste tires.

Measures:

- P2→**
- a. Provide pollution prevention (P2) and waste minimization assistance. Evaluate the hazardous waste generation data, including the state hazardous waste minimization profile compiled by EPA Region 8, to identify opportunities to improve utilization of this information for increased P2/waste minimization.
 - b. Provide timely and effective compliance monitoring and assistance, enforcement actions, and permitting responses based upon a balance of priorities and available resources.
 - c. Provide for innovative solutions to solid and hazardous waste stabilization and cleanup activities (non-Superfund sites).

DSHW ANNUAL GOALS:

- P2→ 1. WASTE MINIMIZATION**
- Implement and support waste minimization and pollution prevention of hazardous waste generation.

Measures:

- a. Identify and evaluate supplemental environmental projects that are a part of a compliance action as well as the Small Quantity Generator (SQG) compliance assistance program to determine their contribution to waste minimization and pollution prevention. Supplemental environmental projects contributing to waste minimization/pollution prevention will be reported to EPA.
- b. Continue Division pollution prevention policy implementation. Provide pollution prevention information and technical assistance, via fact sheets, newsletters, and

electronic media, to staff and businesses that generate hazardous waste. As necessary, help maintain and supply Department P2 library with resources regarding P2, waste minimization, source reduction and recycling.

- c. Continue working relationship between DSHW and EPA hazardous waste minimization program to assure that P2 resources are leveraged as appropriate to meet common goals. EPA and DSHW will look for opportunities to reflect how state actions support national goals. Review, comment on, and utilize state hazardous waste generation profiles prepared by EPA to increase waste minimization and P2 efforts and successes and to meet other specific state needs. Identify opportunities to link waste minimization efforts to reductions in listed PBT chemicals in RCRA waste streams within the state.
- d. Evaluate the amount of used oil collected for recycling, particularly used oil collected from Do-it-yourselfers (DIYers).

DSHW INDIVIDUAL SECTION ANNUAL GOALS:

i. Hazardous Waste Management Section Annual Goal:

Maintain and an effective pollution prevention and outreach program for hazardous waste generators.

Measures:

- a. Implement P2 and small business incentive and assistance programs.
- b. Continue to evaluate effectiveness of SQG compliance assistance program. Work with SQGs to provide updated information on waste minimization programs and opportunities.
- c. Provide speakers as requested to industry, special interest groups, schools, etc. throughout the year.

ii. Used Oil Section Annual Goals:

Operate an effective DIYer used oil recycling program for Utah.

Measures:

- a. Semi-annual DIYer reimbursements are reviewed, entered into database and warrant requests are signed by section manager and submitted to budget officer for processing by August 1, 2005 and February 2, 2006.
- b. Percent of DIYer reimbursements that are received and processed for payment

will be determined.

Maintain a sufficient number DIYer collection centers to make it convenient for the public to recycle their used oil.

Measures:

- a. Number of existing DIYer used oil collection centers per city and county will be evaluated.
- b. Number of new collection centers established during fiscal year will be documented.

Maintain effective Used Oil Block Grant Program.

Measures:

- a. Number of requests for grant packets received will be documented.
- b. Percent of grant requests approved will be evaluated.
- c. Percent of grant requests approved/disapproved within 60 days will be documented.
- d. Amount of funds awarded will be documented.
- e. Percent of grant payments made within 60 days will be documented.

Enhance the Division's pollution prevention/household hazardous waste outreach program.

Measures:

- a. New P2 fact sheets generated to assist different industries, as needed.
- b. In-house P2 library kept organized and up to date.
- c. Division staff kept abreast of contents of P2 library, how to use the P2 library, and P2 fact sheets.
- d. Specific tasks/ideas outlined in the pollution prevention policy will be incorporated in the every day workings of the Division.

iii. Solid Waste Section Annual Goal:

Continue administration of waste tire recycling program.

Provide review of bids for cleanup of waste tire piles at municipal landfills within 30 days, as funding is available.

Measure:

Time between receipt of bid and adequacy determination is made.

Provide review of bids for cleanup of abandoned waste tire piles within 30 days, as funding is available.

Measure:

Time between receipt of bid and adequacy determination is made.

CPM → 2. PERMITS, CLOSURE, POST-CLOSURE

Maintain effective solid and hazardous waste permitting and closure/post closure programs. The state and EPA will work together to achieve this goal; where state and EPA priorities differ, appropriate discussions between both agencies will be conducted to reconcile such differences. EPA will provide technical assistance, training, and other support where appropriate. EPA and DSHW continue to jointly recognize past efforts that resulted in the issuance of required closure/post closure and operating permit approvals for hazardous waste management facilities creating a necessary focus of ongoing maintenance of these program accomplishments. Consequently, the following measures apply to FY2006 performance activities.

Measures:

- a. Maintain accurate information of the universe and status of hazardous waste facilities subject to closure requirements, post-closure permits, and operating permits. Provide the preceding information through automated data systems (RCRAInfo) for all required data elements by the 15th of the month following the activity.
- b. Provide appropriate closure/post-closure and permit response as dictated by case-by-case specifics, regulatory/statutory requirements, permit conditions, and program priorities. Appropriate responses may include, but are not limited to, closure plan approvals (RCRAInfo data element CL360), closure verifications (CL380), final post-closure permit determinations/issuances (PC200), and final operating permit determinations (OP200). Permit modifications (PC240) are as

equally important as the preceding activities because they generally reflect upgrading or updating permit conditions resulting in operational improvements for permitted TSDFs in managing hazardous waste.

- c. Conduct periodic analysis of effectiveness of closure/post-closure and permitting activities utilizing program tracking information and conducting briefings with staff for ongoing coordination. This will help to identify areas of progress and areas of concern. Updates to future strategies for accomplishing such activities will be made, as necessary, as part of the FY2006 planning process.

DSHW INDIVIDUAL SECTION ANNUAL GOALS:

i. Hazardous Waste Facilities Section Annual Goal:

Implement an effective permitting program for hazardous waste treatment and storage facilities regulated by the HWF section.

Measures:

- a. All facility permit modification requests are evaluated and addressed within required regulatory time frames.
- b. Identify facilities requiring a five-year permit review or a ten-year permit reissuance by September 30, 2005. Complete five-year reviews in a timely manner. Process permit applications for reissuance and issue Notices of Deficiency (NODs), if necessary, in a timely manner.
- c. Assist and oversight facilities in closure/post-closure activities as they become necessary. Complete reviews of closure plans and closure certifications in a timely manner. Issue closure verifications in a timely manner. Process post-closure permit applications within required regulatory time frames.
- d. Identify the application status of interim status facilities by September 30, 2005. Process applications submitted by interim status facilities and issue final determinations in a timely manner. Provide guidance to interim status facilities preparing permit applications.
- e. Provide facility specific permitting information to RCRAInfo within required time frames.
- f. Conduct periodic analysis of the effectiveness of the permitting process.

ii. Commercial/Federal Facilities Section Annual Goal:

Maintain an effective permitting program for the commercial and federal hazardous waste

treatment, storage, and disposal facilities (C/FF).

Measures:

- a. Meet all C/FF permit commitments as determined with the facilities.
- b. Complete all on going permit modifications as requested within regulatory time frames.
- c. Ensure that permit conditions are based on statutory and regulatory requirements.
- d. Ensure that staff assignments are made taking into consideration appropriate workloads.
- e. Meet FY 2006 goals.

iii. Chem Demil Section Annual Goal:

Ensure permits meet regulatory requirements, are enforceable, and provide for protection of human health and the environment.

Measures:

- a. Permit conditions are clear and the facility can operate in compliance with the conditions.
- b. Permit standards are uniform for each permitted activity, when applicable.
- c. Permit conditions are based upon regulatory requirements.
- d. Staff assignments made with appropriate workloads.
- e. FY 2006 goals are met.

iv. Used Oil Section Annual Goals:

Process all complete permit applications in a timely manner.

Measure:

Average number of working days for permit review.

Maintain uniform permits and permit reviews that consistently enforce the used oil management standards.

Measures:

- a. Permit formats will be reviewed for consistency and errors and updated to reflect any new rule changes.
- b. Used oil rule booklet modified, as needed.

v.

Solid Waste Section Annual Goals:

Process all permit applications in a timely manner.

Measures:

- a. Number of working days for permit review.
- b. Number of days for review of Requests for Additional Information (RAI) responses.
- c. Number of RAI's issued.

Maintain uniform permits and permit reviews that consistently enforce the solid waste rules through use of EPA Technical Assistance Manual and peer review.

Measures:

- a. Peer reviews conducted
- b. Modify standard permit as needed.

Review permit applications for Class II, Class III, Class IV, and Class VI facilities within 60 days of receipt of application.

Measure:

Number of days from receipt of application to issuance of first RAI or draft permit.

Review permit applications for Class I and Class V facilities within 120 days of receipt of application.

Measure:

Number of days from receipt of application to issuance of first RAI or draft

permit.

CPM → 3. CORRECTIVE ACTION

Maintain effective corrective action program, including stabilization of environmental releases and clean up of contaminated hazardous waste sites. DSHW and EPA will work together to achieve this goal; where DSHW and EPA priorities differ, appropriate discussions between both agencies will be conducted to reconcile such differences. EPA will provide technical assistance, training, and other support where appropriate.

Measures:

- a. Maintain and update, as necessary, facility specific corrective action information (universe identification and status) for hazardous waste facilities subject to corrective action, including site assessment, stabilization (accounting for health and environmental risk control measures), and regular corrective action process activities through staff interaction, correspondence and/or automated data systems (RCRAInfo). For RCRAInfo, all required data elements will be entered by the 15th of the month following the activity.
- b. Provide appropriate corrective action response as dictated by case-by-case specifics, regulatory/statutory requirements, permit conditions, or program priorities. Emphasis is on high priority facilities. Appropriate measures may include initial assessment of all TSDs in the corrective action universe including assessment completed (CA050), determination of the need for an RFI (CA070), and CA universe ranking (CA075)), RFI imposed (CA100), RFI approved (CA200), remedy selection (CA400), CMI construction completed (CA550), and corrective action process completed (CA999/RE).
- c. Provide appropriate stabilization response as dictated by case-by-case specifics, regulatory/statutory requirements, permit conditions, or program priorities. Emphasis is on high priority facilities. Appropriate measures may include stabilization measures evaluation (CA225), stabilization imposed (CA600), stabilization construction completed (CA650), and stabilization process complete (CA999/ST).
- d. Conduct periodic analysis of the effectiveness of corrective action activities and update, as necessary, future strategies for accomplishing such activities as part of the FY2006 planning process. This analysis may include the following environmental indicators: the number and percentage of handlers subject to corrective action with (1) human exposures under control (CA725), and with (2) migration of contaminated groundwater under control (CA750). DSHW will prepare, complete, and submit to EPA Region 8 appropriate documentation of

accomplishments of the above indicators.

- c. In coordination with EPA Region 8, DSHW will continue to evaluate annually and amend, as necessary, the facility-by-facility multi-year plan (up to FY2006) of how and when the environmental indicators of paragraph d. will be achieved. Updated projections will be submitted by October 1, 2005, including an indication if EPA's corrective action goals for FY 2008 can be achieved.

DSHW INDIVIDUAL SECTION ANNUAL GOALS:

i. Hazardous Waste Management Section Annual Goal:

Provide compliance oversight for the Voluntary Corrective Action (VCA) program. Conduct oversight and review of corrective action facilities to facilitate effective remediation of contaminated sites.

Measures:

- a. Review and provide comments on reports and plans as required by the time frames contained in VCA agreements.
- b. Encourage the use of innovative solutions to site remediation.
- c. Continue to develop and update database to track VCAs and show status, coordination, etc. of VCAs

ii. Hazardous Waste Facilities Section Annual Goals:

Implement an effective corrective action program for hazardous waste treatment and storage facilities regulated by the HWF section.

Measures:

- a. Identify the status of hazardous waste treatment and storage facilities regulated by the HWF section that are subject to corrective action by September 30, 2005. Determine corrective action goals for each facility.
- b. Review and comment on submitted corrective action plans and reports within the time frames identified in the corrective action module of the permit or Consent Agreement/Order (some interim status facilities are initiating corrective action prior to permit issuance through an Agreement or Order).
- c. Encourage the use innovative technologies in site remediation.
- d. Provide facility specific information to RCRAInfo within required time frames.

- e. Conduct periodic analysis of the effectiveness of the corrective action process.

Implement an effective voluntary corrective action program for non-TSD entities that have entered into an agreement with the Division and that are being over sighted by the HWF section or for non-TSD entities that have applied to the Department's Voluntary Cleanup Program that are being over sighted by the HWF section.

Measures:

- a. Review and comment on submitted plans and reports within the time frames identified in the agreements.
- b. Encourage the use of innovative technologies in site remediations.
- c. Conduct periodic analysis of the effectiveness of the voluntary corrective action process.

iii. Commercial/Federal Facilities Section Annual Goal:

Maintain an effective corrective action program for the commercial and federal hazardous waste management facilities (C/FF).

Measures:

- a. Review and comment on submitted plans and reports for TEAD and Ashland Chemical in a timely manner.
- b. Encourage the use of innovative technologies in site remediations.
- c. Continue to evaluate the need for corrective action at all C/FF sites.

iv. Chem Demil Section Annual Goal:

Maintain and effective corrective action program for the Chem Demil Facilities.

Measures:

- a. Solid Waste Management Units (SWMUs) are characterized using best industry standards.
- b. SWMU's are prioritized for corrective action based on relative risk as determined by the most recent site data.
- c. Corrective action decisions and actions are conducted in accordance with Utah

corrective action and cleanup standards (R315-101).

- d. Staff assignments made with appropriate workloads.
- e. FY 2006 goals are met.

4. COMPLIANCE AND ENFORCEMENT

Evaluate compliance status of solid waste, hazardous waste, and used oil handlers and facilities and foster an ongoing commitment to compliance and environmental protection through on-site inspections and other compliance assistance activities.

Measures:

- a. Update inspection universe and develop inspection schedule for FY2006, by September 30, 2005. The selected universe and schedule will incorporate, as appropriate, state, regional, and national priorities.
- b. Complete targeted inspections by September 30, 2005.
- c. Continue implementation of the small quantity generator compliance assistance program in FY2006. Participate in joint state and federal industry sectors initiatives.
- d. Provide facility specific compliance and enforcement information through the proper and timely entering of program data into automated data systems (RCRAInfo, EIMI).
- e. Conduct periodic analysis of effectiveness of evaluation activities. This will consist of staff and/or facility contact and data systems reports to note areas of progress and areas of concern.
- f. Continue coordination of EPA Region 8's implementation of the CERCLA Offsite Rule (OSR). A regional implementation policy has been established and will serve as the basis for the Region's implementation of the OSR.

DSHW INDIVIDUAL SECTION ANNUAL GOALS:

- i. **Hazardous Waste Management Section Annual Goal:**
Have an effective Compliance/Enforcement oversight program for hazardous waste generators.

Measures:

- a. Develop a work plan by September 30, 2005, identifying the generator universe to be inspected during FY 2006. The LQG universe will be defined by the September 30, 2005, RCRAInfo data pull.
- b. Conduct on-site evaluations of SQGs as per the Division's SQG compliance assistance program.
- c. Complete inspections, reports, and associated actions within appropriate time frames.

ii. Hazardous Waste Facilities Section Annual Goal:

Implement an effective compliance oversight program for hazardous waste treatment and storage facilities regulated by the HWF section.

Measures:

- a. Identify facilities to be inspected and develop inspection schedule for FY2006 by September 30, 2005.
- b. Complete all inspections identified in the HWF inspection schedule by September 30, 2006.
- c. Provide facility specific compliance information to RCRAInfo within required time frames.
- d. Conduct periodic analysis of the effectiveness of inspection process.

iii. Commercial/Federal Facilities Section Annual Goals:

Maintain an effective compliance oversight program for the assigned commercial and federal hazardous waste management facilities (C/FF).

Measures:

- a. Meet all C/FF commitments identified in the C/FF inspection schedule.
- b. Finalize FY2006 C/FF inspection schedule by September 30, 2005.
- c. Supply a copy of the FY2006 inspection schedule to Section staff by October 7, 2005.
- d. Conduct all inspections as identified in the schedule by September 30, 2006.

- e. Conduct on-site compliance evaluations (inspections) of operating commercial land disposal and incineration facilities on an average of twice per month and utilize the section's "Oversight of Commercial Hazardous Waste Management Facilities" guidance document. Conduct inspections of the federal facilities and other commercial facilities on an as-needed basis.
- f. Complete inspection reports/enforcement actions in accordance with Division/Section inspection/enforcement strategy and policy.
- g. Complete compliance assistance inspections as needed.

iv. Chem Demil Section Annual Goal:

Maintain a comprehensive and efficient oversight program of Chem Demil Facilities.

Measures:

- a. Conduct inspections in accordance with EPA partnership agreement and meet compliance/enforcement time frames.
- b. FY 2006 inspection goals are met.
- c. Available resources identified.
- d. Compliance information resources (reports, checklists, etc.) understood by all section inspectors.
- e. Inspection strategy for each Chem Demil activity followed.
- f. Staff assignments made with appropriate workloads.

v. Used Oil Section Annual Goals:

Operate an effective compliance oversight program for all used oil facilities and collection centers regulated by the Used Oil Management Standards.

Measures:

- a. Provide guidance to facility owners/operators and collection centers through periodic inspections, timely inspection reports and defining compliance issues. Permitted and registered facilities are inspected at least annually. Perform one audit per year of a permitted used oil facility.
- b. Annual inspections are thorough and inspectors provide assistance.

- c. Update inspection universe and develop inspection schedule for FY2006, by September 30, 2005.
- d. Complete targeted inspections by September 30, 2006.
- e. Audit completed for one used oil facility.

Maintain documentation of inspection and compliance history of each facility.

Measures:

- a. Inspection reports will be filed and files kept up-to-date.
- b. Inspection information will be entered into used oil database.
- c. Facility specific compliance and enforcement information will be provided through the proper and timely entering of EPA and used oil program data into the used oil database and RCRAInfo.

vi. Solid Waste Section Annual Goals:

Pursue statewide compliance with solid waste rules.

Provide guidance to facility owners or operators through periodic inspections, timely inspection reports and defining compliance issues. Municipal facilities inspected a minimum of once each year and increased frequency based on waste volume and type. Class V facilities inspected quarterly and Class VI facilities inspected semiannually.

Measures:

- a. Percent of inspection in which local health department was notified in advance with an invitation to participate.
- b. Percent of facilities inspected once each year.
- c. Percent of facilities inspected more than once per year.
- d. Percent of facilities inspected quarterly.
- e. Percent of inspection reports completed and mailed within 10 days of the inspection.

Inspect all facilities for all permit conditions and applicable regulatory requirements each year.

Measures:

Percent of facilities that show all permit conditions checked during each fiscal year.

Maintain enforcement of waste tire storage and waste tire disposal rules.

Measures:

- a. Inspections conducted.
- b. Local health departments contacted.
- c. Local health departments participating in inspections

Compile and spot check waste tire transporter monthly flow reports.

Measures:

- a. Total reports within 15 days of receipt.
- b. Number of reports spot checked.

5. TRAINING / TECHNICAL ASSISTANCE

Continuously improve DSHW technical expertise in the RCRA program.

Measures:

- a. Provide specific technical training to new staff and provide refresher training, as needed, for staff in FY2006.
- P2→** b. Work with EPA to plan and provide training offered by EPA including corrective action, permitting, risk assessment, pollution prevention, and other related program functions.
- c. With EPA, jointly identify areas where technical assistance needs could be provided by EPA regional staff, EPA research labs, and contractors. DSHW and EPA staff will provide technical direction to the contractors.

CPM → 6. INFORMATION MANAGEMENT

Report key program accomplishments as noted in the above annual goal sections via automated data systems or direct correspondence, to accurately reflect the status of the RCRA handler universe. The DSHW will continue to maintain timely, accurate and complete data, including compliance and enforcement data, and federally required data fields in RCRAInfo. EPA will work with the state to clarify or resolve universe issues and provide training and technical assistance when requested. Program areas will include permitting, compliance/enforcement, closure/post-closure, corrective action, and waste minimization. DSHW and EPA will utilize RCRAInfo and other state data systems for assessing accomplishments in these program areas. Data will be entered into RCRAInfo for all required data elements by the 15th of the month following the activity.

Significant violators, significant noncompliers, and high priority violators will be identified and reported to EPA, utilizing appropriate RCRAInfo codes, as agreed upon by DSHW and EPA, and in a manner consistent with national policy and guidance.

Conduct any necessary data cleanup of the 2003 hazardous waste biennial report information.

DSHW INDIVIDUAL SECTION ANNUAL GOALS:

i. Hazardous Waste Management Section Annual Goal:

Have an effective data management program for Hazardous Waste Management Section that will meet the Division Goal.

Measures:

- a. Maintain current compliance tracking system and supply information for RCRInfo.
- b. Provide the required RCRInfo information by the 10th of each month.
- c. Update, review, and evaluate the sections compliance and inspection tracking database.
- d. Review and update the RCRInfo Corrective Action universe, as needed.

ii. Commercial/Federal Facilities Section Annual Goal:

Maintain the RCRAInfo data management program for the C/FF section.

Measures:

- a. Provide the required RCRAInfo information to the appropriate staff for input into RCRAInfo by the 10th of each month.

- b. Evaluate the data in RCRAInfo to determine if it accurately represents the permitting, corrective action, and compliance/enforcement work completed.

iii. Chem Demil Section Annual Goal:

Maintain Chem Demil program activities in automated data systems.

Measures:

- a. RCRAInfo data are complete and accurate.
- b. Section database is populated with relevant data.
- c. Permitting, corrective action, and compliance data are useful and accessible.

iv. Used Oil Section Annual Goal:

Complete 2005 hazardous waste (biennial) reporting activity and submit to EPA by established time frames.

Measures:

- a. 2005 report forms will be distributed to those hazardous waste facilities required to submit report (November-December 2005).
- b. Data quality/verification and necessary edits performed on received reports (June 2006).
- c. A complete draft of Utah's biennial reporting information passing basic edits will be sent to EPA for review by August 31, 2006. EPA will review submittal and notify DSHW of any noted deficiencies by November 1, 2006.
- d. By November 30, 2006, any deficiencies identified by EPA will be corrected and final data will be submitted to EPA for development of the Final 2003 National Biennial Report to be published no later than January 31, 2007.

EJ→ 7. ENVIRONMENTAL JUSTICE

The State recognizes that incorporation of environmental justice into the RCRA regulatory program is a priority for EPA Region 8. Upon request, EPA will provide the State access to Geographic Information System (GIS) environmental justice tools; provide information to the State on environmental justice grants; and share information about any available environmental justice resources. The State commits to utilize EPA

staff and GIS resources as appropriate in the implementation of the State hazardous waste program.

Measures:

- a. EPA and DSHW will work jointly to develop measures for evaluation.
- b. Incorporate, as appropriate, environmental justice concerns in administration of the program.

DSHW STRATEGIC GOAL:

Balance economic factors with compliance and permitting actions.

Measure:

Evaluate stakeholders' economic viability when determining compliance and permitting actions.

DSHW ANNUAL GOAL:

Consider economic factors in determining penalties for violations.

Measures:

- a. Use EPA economic computer models to assist in evaluation.
- b. Use maximum flexibility when negotiating consent agreements to include consideration of financial viability of regulated party.

DSHW INDIVIDUAL SECTION ANNUAL GOALS:

i. Commercial/Federal Facilities Section Annual Goal:

Balance section permitting and compliance actions between economic development and environmental quality.

Measures:

- a. Ensure that all permitting and compliance actions are protective of human health and the environment, that they are enforceable, and that they are innovative and economically feasible.

- b. Consider "Environmental Justice" issues when determining penalties; however, the final penalty amount is not solely dependent on the facility location.

DSHW STRATEGIC GOAL:

Provide leadership in Utah, the western region, and nationally to influence national policies on waste management activities.

Measures:

- a. Division staff attend and actively participate in WGA, NGA, ASTSWMO, and EPA committees, including task forces, etc., to provide maximum input in development of policies.
- b. Staff will submit comments which reflect Utah policies on proposed federal solid and hazardous waste programs.

DSHW ANNUAL GOAL:

Ensure staff availability to attend regional and national policy meetings and to participate on appropriate committees.

Measures:

- a. Determine success of legislative, budget, and policy initiatives identified as priorities.
- b. Appropriate input is given directly by state and through organizations to decision makers on priority issues.

DSHW INDIVIDUAL SECTION ANNUAL GOALS:

i. Commercial/Federal Facilities Section Annual Goal:

Provide leadership by participating in national organizations and task forces, provide comments on important legislation and rule changes.

Measures:

- a. Maintain association with ASTSWMO Compliance/ Enforcement Task Force, attend meetings as appropriate.
- b. As appropriate, comment on rules that could impact the C/FF section.

- c. Maintain association with EPA technical support, attend meetings as appropriate.
- d. Participate in national focus groups, as appropriate.

CUSTOMER SERVICE

DSHW STRATEGIC GOAL:

The Division will operate and function as an internal and external customer-oriented agency by focusing on customer service, building trust, and problem-solving through cooperative efforts in all Division activities and partnerships.

Measures:

- a. Customer feedback is solicited and evaluated.
- b. Decisions and services are provided within mutually agreed-upon time frames which best meet customers' needs and provides appropriate environmental protection.

DSHW ANNUAL GOALS:

Permitting and compliance processes will involve continuous customer input to provide workable and fair permits and compliance actions.

Measures:

- a. Permitting process will include regular contacts with applicant, local governments, other agencies, counties, and the impacted general public.
- b. The public will be involved as required by statute, regulation, or state public participation policies so that access to public records during public comment periods will allow appropriate time for public participation.
- c. Compliance and enforcement process will include regular meetings with affected parties prior to final determinations.
- d. Surveys will be provided to external customers involved in the permitting and/or inspection process(es) seeking specific feedback on process successes as well as process improvements. Surveys are voluntarily completed and returned to the Division for review, compilation, and follow up.

- e. Internal processes will be assessed to identify areas for improvement.
- f. Fact sheets regarding permit modifications and permit issuance will be available on the Internet and will be developed to be understandable by the public.
- g. An electronic public viewing area will be developed so the public can view documents on a computer at times convenient to them and not just during business hours.

DSHW INDIVIDUAL SECTION ANNUAL GOALS:

i. Hazardous Waste Facilities Section Annual Goals:

Maintain customer service throughout the compliance, permitting, and corrective action processes.

Measures:

- a. Compliance and enforcement process will include regular meetings with affected parties prior to final determinations.
- b. Permitting process will include regular contacts with the applicant and, when appropriate, local counties and governments, other regulatory agencies, and the general public.
- c. Corrective action process will include regular contacts with the applicant and, when appropriate, local counties and governments, other regulatory agencies, and the general public.
- c. Periodically send out customer survey forms after inspections, permitting, and corrective action activities asking for specific input on our processes. Evaluate customer survey forms on receipt.

Internal and external customers are able to obtain information and are knowledgeable about the mission and responsibilities of the HWF section.

Measures:

- a. All informational phone calls and written information requests are answered in a timely manner.
- b. Update the information on the HWF section in the Division home page as needed.

- c. Provide routine updates on permitting and compliance activities to the Utah Solid and Hazardous Waste Control Board.
- d. Update RCRAInfo as events occur.

ii. Commercial/Federal Facilities Section Annual Goal:

Perform all section work with an internal and external customer-oriented approach.

Measures:

- a. Compliance and enforcement processes will include regular meetings with affected parties.
- b. Permitting process will include regular contacts with the applicant, and, if applicable, local health department, local government, and the public.
- c. Staff will help the public understand applicable regulations in a courteous and professional manner.
- d. Staff will be open and honest in Division-required public information meetings.
- e. Staff will accept invitations to discuss hazardous waste issues in public settings, to professional groups, schools, or other interested organizations.
- f. The Division Web pages will be maintained and updated, as needed, so that the information is available to the general public.

iii. Chem Demil Section Annual Goals:

Improve risk communication to the public.

Measures:

- a. Staff willingly help the public understand applicable regulations.
- b. Staff willingly help the public understand environmental studies and data.
- c. Staff are open and honest in Division required public information meetings.
- d. Staff accept invitations to discuss hazardous waste issues in public settings, to professional groups, in schools, or wherever requested.

Maintain Chem Demil Internet homepage. Information for stakeholders is available 24/7.

Measures:

- a. Maintain homepage outlining responsibilities of the Section.
- b. Maintain and improve the Web pages to summarize waste management activities at Chem Demil facilities.
- c. Maintain and improve the Web pages to educate the public concerning the safety of waste management activities at Chem Demil facilities.
- d. Key reports, studies, permits, and interesting Chem Demil program data are accessible through the Internet.
- e. Public viewing area for permit modifications available on the Internet.

iv. Used Oil Section Annual Goals:

Keep customer informed of process on permit, grant request, registration, compliance and rulemaking activity.

Measures:

- a. Compliance and enforcement process will include regular meetings with affected parties prior to final determination.
- b. Permitting process will include regular contacts with the applicant, and local health department, and, if applicable, local government and the public.
- c. All new permit applications will include a 15-day comment period for the general public to review and respond.
- d. Customer survey forms will be sent out after annual inspections and permit issuance asking for input on permitting and compliance process.
- e. Customer survey forms will be evaluated annually.
- f. All proposed rulemaking will include a 30-day public comment period.

Respond to complaints and information requests in a timely manner.

Measures:

- a. Complaints received by used oil program staff will be referred to local health departments as soon as practicable for follow up.

- b. Verification that complaints have been followed up by local health departments will be performed.
- c. Verification that appropriate clean up actions are taken where needed will be performed.

Provide complete answers to informational requests from customers in a timely manner.

Measure:

All telephone calls requesting information and submitted written requests will be answered in a timely manner.

Keep customers informed of section activities. Maintain information for customers on the Internet and in writing.

Measures:

- a. Web page information, including lists of DIYer collection centers and permitted used oil facilities, will be kept current.
- b. Public notices of 15-day comment period for permits and 30-day comment period for proposed rulemaking will be posted on the web page and in appropriate publications.
- c. Used Oil Drip newsletter will be published and distributed once a year to all local health departments, steering committee members, local government, collection centers, appropriate legislators, special interest groups and, as requested, by other interested individuals from the public.

v. Solid Waste Section Annual Goals:

Develop and maintain communication throughout the permitting process with applicant, local governments, counties, local health departments, public and district engineers.

Inform each permit applicant, within five days of receipt of a permit application, of the permit review process and the applicable costs involved.

Measure:

Percent of letters sent within five working days of receipt of application.

Respond to solid waste complaints and information requests in a timely way and follow up where needed.

Measure:

- a. Number of complaints received.
- b. Number of days required to respond.

PARTNERSHIP WITH FEDERAL, STATE, LOCAL AND TRIBAL GOVERNMENTS

DSHW STRATEGIC GOAL:

Improve the effectiveness and efficiency of statewide delivery of environmental services by strengthening relationships with all levels of government.

- * Work with federal, state, local (including local health departments), and Tribal governments and provide information to plan for and manage the environmental impacts of growth.
- * The Environmental Services Delivery Plan (ESDP) delineates roles and responsibilities, joint goals and objectives, and establishes accountability between DSHW and local health departments and local governments.
- * Focus on teamwork and partnership in identifying and resolving problems.
- * Feedback on success of partnerships is received and evaluated.

Measures:

- a. Key problems identified by government partners are addressed and solutions developed and implemented.
- b. Effectiveness of the Environmental Service Delivery Plan in developing a state/local partnership, coordinating delivery of services, and obtaining adequate resources.
- c. Effectiveness of the Performance Partnership Agreement in developing a state/federal partnership, coordinating delivery of services, and obtaining adequate resources.

DSHW ANNUAL GOAL:

The DSHW and EPA will strive to enhance the State/EPA partnership and to ensure the management of a quality hazardous waste program.

Measures:

- a. Program guidance/agreements: DSHW and EPA will jointly develop and maintain the MOA, the enforcement agreement, quality assurance plan for environmental data collection, and other operating guidance. In FY2006, DSHW and EPA may review and revise, if necessary, the MOA.
- b. Strategic planning: the DSHW and EPA will jointly plan and prioritize program goals, objectives and activities which address joint priorities. DSHW and EPA will work together on PPA development, program activities and priorities, inspection strategies, planning meetings, program reviews, and national assessments of major program elements.
 - i. DSHW will include in its ongoing program implementation activities, unpermitted waste handling and management operations that may present significant environmental concerns. DSHW will evaluate, where appropriate, the use of Supplemental Environmental Projects (SEPs) that reduce emissions or discharges associated with persistent bioaccumulative and toxic wastes and other priority chemicals being released. DSHW will also consider issuance of orders to address upsets and episodic releases or emissions in accordance with current state laws.
 - ii. DSHW will work with the Region to contribute to the development of a national enforcement and compliance assurance strategy for the Metal Services sector.
 - iii. Region 8 will draft a preliminary report summarizing previous years' sector efforts and identifying next steps for the selected industry sectors.
- c. Coordination of joint activities: DSHW and EPA will maintain a high level of coordination and cooperation between state and EPA staff to assure successful and effective administration of the program. Coordination includes evaluation of desirable technical support and targets for joint efforts/work sharing.
- d. Program communication: maintain frequent/open communication on routine matters, changes in program capability, legislation, and resource levels, emergency situations, and other key activities as described in the MOA. EPA and DSHW will hold regular meetings or conduct conference calls, at least quarterly,

to share information, identify and solve problems, and engage in short-term planning efforts.

- e. Training and technical assistance: the DSHW and EPA will jointly identify state training and technical assistance needs. EPA will make training and technical assistance available to the state and will work towards improving the capability to provide high quality assistance.

DSHW INDIVIDUAL SECTION ANNUAL GOALS

i. Hazardous Waste Facilities Section Annual Goal:

Strive to enhance the State/EPA partnership.

Measures:

- a. Adhere to the guidelines of the MOA and enforcement agreement.
- b. Maintain a high level of coordination and communication with EPA counterparts on administering all aspects of the program.
- c. Ensure EPA is made aware of training and technical assistance needs.

ii. Commercial/Federal Facilities Section Annual Goal:

Meet all Department and Division annual and strategic goals. Work on improving the Section's relationship with EPA Region 8.

Measures:

- a. Obtain and provide, in a timely manner, a copy of the Department and Division goals to all staff and encourage an open dialog about what the goals mean.
- b. Complete all Department and Division goals that apply to the C/FF section.
- c. Adhere to the guidelines of the MOA, enforcement agreement, and the Enforcement Response Policy as agreed to by DSHW and EPA.
- d. Work to improve the relationship with EPA Region 8.
- e. Provide information as requested to educational facilities, civic groups and other Utah citizen organizations.

iii. Chem Demil Section Annual Goals:

Establish good relationship between section personnel and parties interested or concerned with program activities and related regulations.

Measures:

- a. Provide leadership to the State and nation by becoming experts in fields of incineration, quality assurance / quality control, risk assessment, and chemical agent demilitarization and remediation.
- b. Improved working relationship with EPA staff.
- c. Improved coordination with local health departments.
- d. Up-to-date information on facilities provided to Board members.

Enhance working relationship with regulated facilities.

Measures:

- a. Improved communications to obtain better submittal of data.
- b. Continued self-reporting of unusual on non-compliant situations at the facilities.
- c. Shorter turnaround time for submitted plans and modifications.

iv. Used Oil Section Annual Goals:

Partnership with local health departments to promote the proper recycling of used oil and protect the environment. Work with local health departments to develop effective used oil work plans as part of the Environmental Services Delivery Plan.

Measures:

- a. Negotiate individual used oil work plans by May 31, 2006.
- b. Final used oil work plans are agreed upon by July 1, 2006.

v. Solid Waste Section Annual Goal:

Work with EPA to coordinate national programs and incentives to meet the requirements for environmental protection in Utah.

Participate on ASTSWMO solid waste task forces that have influence and contact with EPA solid waste staff and programs.

Measures:

- a. Task Force membership
- b. EPA contacts made

Continue to work with EPA on Landfill Methane Outreach Program

Measure:

Meetings with landfills on landfill gas projects

STATE-BASED REGULATION OF ENVIRONMENTAL PROGRAMS

DSHW STRATEGIC GOAL:

Develop statutory and regulatory authorities to qualify for continued program authorization.

Measure:

Updated program authorization is granted by the federal government.

DSHW ANNUAL GOALS:

- 1. Adopt new hazardous waste, solid waste, and used oil rules promulgated by EPA to maintain regulatory equivalency and program authorization.

Measures:

- a. Identify new federal hazardous waste rules promulgated during cluster period ending June 30, 2005 and which require adoption by the Solid and Hazardous Waste Control Board.
- b. Rulemaking process will be completed by August 2006.
- 2. Submit updated authorization applications to EPA to maintain hazardous waste program authorization.

Measures:

- a. Submit final authorization application for Addendum 12 by March 31, 2006.

- b. Draft authorization application for Addendum 13 will be submitted to EPA for review and comment by June 30, 2006.

DSHW INDIVIDUAL SECTION ANNUAL GOALS:

i. Hazardous Waste Facilities Section Annual Goal:

Provide assistance in the adoption of new hazardous waste rules promulgated by EPA to maintain regulatory equivalency and program authorization.

Measure:

Maintain knowledge of new hazardous waste rules that are critical to program implementation.

ii. Chem Demil Section Annual Goal:

Improve regulatory process through involvement in rulemaking.

Measures:

- a. Provide comment on proposed rules.
- b. Develop new rules when needed to achieve protection of human health and the environment.

iii. Commercial/Federal Facilities Section Annual Goal:

Provide assistance in the adoption of new hazardous waste rules promulgated by EPA or the state in order to maintain regulatory equivalency and program authorization.

Measures:

- a. Maintain knowledge of new hazardous waste rules that are critical to program implementation.
- b. Provide comments on proposed rules, as necessary.

iv. Used Oil Section Annual Goal:

Work with EPA to ensure continued state primacy for used oil program. Adopt appropriate used oil regulations promulgated by EPA to maintain regulatory equivalency and program authorization.

Measures:

- a. Review rules and recommend changes, if necessary, to remain protective of public health and the environment.
- b. Provide comments on proposed federal used oil rules.
- c. Review statute and, if necessary, recommend changes to continue the promotion of used oil recycling and the protection of public health and the environment.

v. Solid Waste Section Annual Goals:

Maintain and update, as necessary, solid waste program authority and related rules. Review changes to federal solid waste program and assess impact on Utah and need to modify Utah program.

Measure:

Days to evaluate rule.

Propose rule changes to the Solid and Hazardous Waste Control Board, as needed, to implement federal rules, update rules, clarify rules, and maintain state flexibility.

Measure:

Rulemaking proposals prepared for Board review and approval.

Identify legislative issues affecting the solid waste program to be addressed in the 2006 Legislative session.

Measure:

Legislative needs identified and relayed to the Department for inclusion in Department legislative package.

COORDINATION WITH LOCAL HEALTH DEPARTMENTS AND LOCAL GOVERNMENTS

DSHW STRATEGIC GOAL:

Improve the efficiency of statewide delivery of waste management services by strengthening relationships with local health departments and EPA.

Measures:

- a. Key waste management problems identified and implemented by partnership of local health departments, local government, DSHW, and EPA.
- b. Adequate resources combined to fully implement Environmental Service Delivery Plan.

DSHW ANNUAL GOALS:

- 1. Strong positive relationship established among DSHW, local health departments, and EPA.

Measures:

- a. Each local health department notified of any Division activities occurring in their areas of jurisdiction.
 - b. Division Director and/or other appropriate staff meet with each local health department at least annually.
 - c. Coordinate partnership efforts among the Division, local health departments, and EPA.
- 2. Local governments will be informed concerning solid waste, used oil programs, etc., in order to be able to comply with appropriate regulations and plan for future needs.

Measures:

- a. DSHW will participate, when invited, with local government organizations, at regular seminars and training meetings, as well as respond to individual requests for information.
- b. Input will be directly solicited from local governments regarding proposed rules which could impact their areas of jurisdiction.

DSHW INDIVIDUAL SECTION ANNUAL GOALS:

- i. **Hazardous Waste Management Section Annual Goal:**
Work with Local Health Departments (LHD), State Agencies and EPA to assist and provide expertise in hazardous waste management programs.

Measures:

- a. Section staff will participate, when invited, with local government organizations, at seminars and training meetings, as well as respond to individual requests for information.
- b. Invite participation of local health department staff to help with and assist in hazardous waste generator inspections and compliance assistance.

ii. Hazardous Waste Facilities Section Annual Goals:

Develop and maintain strong positive partnerships with local health departments.

Measures:

- a. Provide local health departments with the opportunity to participate when conducting inspections at the hazardous waste treatment and storage facilities in their area of jurisdiction.
- b. Ensure directors of local health departments are copied on correspondence related to hazardous waste treatment and storage facilities located in their area of jurisdiction.

Keep local governments informed about the hazardous waste program.

Measures:

- a. Participate in training meetings and regular seminars with local governments.
- b. Solicit input from local governments regarding proposed rules.

iii. Commercial/Federal Facilities Section Annual Goal:

Develop and maintain strong, positive partnerships with local health departments.

Measure:

- a. Provide local health departments the opportunity to participate in inspections at the hazardous waste treatment, storage, and disposal facilities in their areas of jurisdiction. Contact local health departments at least once a year and inform them that they are welcome to participate on inspections with staff of the C/FF section.
- b. Provide copies of correspondence to local health departments related to the C/FF section.

iv. Used Oil Section Annual Goals:

Provide local health department with the training necessary for them to fulfill the requirements of their individual used oil work plans in the Environmental Services Delivery Plan.

Assist in providing technical and non-technical training to local health departments, industry, local governments, or other groups.

Measures:

- a. Provide local health departments with the opportunity to participate when conducting inspections at used oil facilities and collection centers.
- b. Ensure directors of local health departments are copied on correspondence pertaining to used oil facilities and activities in their areas.
- c. Visit with local health departments and/or perform joint inspections at least two times per fiscal year.

Provide information and assistance to the public, local governments, health departments and others to improve understanding of the used oil program, and specifically the DIYer program.

Assist counties, local officials, legislators and the public in understanding the DIYer program.

Measures:

- a. Maintain a list of number of used oil presentations given.
- b. Maintain a list of number of used oil steering committees held.
- c. Maintain a list of public education/outreach tools that were implemented during the fiscal year.

Written information provided to local health departments and local officials.

Measures:

- a. Updates of DIYer used oil collection center lists, Used Oil Drip newsletter, copies of all correspondence with used oil facilities located in LHD areas, regulatory updates, etc. are provided to local health departments and local officials when requested. Current information is also available directly from the used oil section Web page.

- b. Semiannual reports provided to local health departments documenting progress on tasks outlined and agreed to in work plans. Assistance is provided when requested.

v. Solid Waste Section Annual Goals:

Provide local Health Departments with the training necessary for them to fulfill the requirements of the work plan.

Assist in providing technical and training to operators and local health departments, through waste industry associations, industry, local governments, or other groups.

Measures:

- a. Number of training sessions held.
- b. Number of joint inspections conducted with local health departments.
- c. Visits made to local health departments and other local governments.

Provide information and assistance to the public, local governments and health departments to improve the waste tire recycling program. Assist counties, waste tire recyclers, and local health departments in understanding the recycling opportunities and requirements of the Waste Tire Recycling Act.

Measure:

Number of meetings with counties and local health departments.

Send an annual update of waste tire recycling activities and quarterly updates of waste tire transporter and recycler lists to local health departments

Measure:

Yearly and quarterly update information sent to all local health departments and other interested parties by end of the month following the end of the fiscal year or quarter.

Create and maintain guidance documents on the division Web page.

Measure:

Documents are placed on Web page and kept current.

EMPLOYEES

DSHW STRATEGIC GOAL:

Maintain a climate in which employees can function to their fullest potential, be recognized for their quality work, and accomplish the goals of DSHW.

Measures:

- a. Employees' assessment of job satisfaction will be solicited.
- b. Individual performance standards will reflect strategic and annual goals.

DSHW ANNUAL GOALS:

1. Employees are committed to the success of DSHW and recognize their professional responsibility and accountability in meeting the needs of the organization.

Measures:

- a. Employees' statements and actions reflect strategic and annual goals and DEQ/DSHW policies and procedures, including the DEQ operating principles.
- b. Annual performance reviews are based on performance standards.
2. Provide appropriate training to employees to increase and foster professional development.

Measures:

- a. Name and number of employees attending training will be maintained.
- b. Skills and abilities of staff will increase as demonstrated by work individual products.
3. Problems will be solved through cooperative effort of division staff.

Measures:

- a. Appropriate Quality Action Teams and other problem-solving teams will be used.

- b. Input from staff will be solicited on issues affecting entire Division.

DSHW INDIVIDUAL SECTION ANNUAL GOALS:

i. Hazardous Waste Management Section Annual Goal:

Have staff that is adequately trained and empowered to do their job effectively and are given appropriate recognition.

Measures:

- a. Meet the Division goals for employee training and recognition.
- b. Provide training in section meetings and identify specific training needs and opportunities.
- c. Encourage and reward staff for innovative ideas, solutions, and proactive approaches to meet goals and objectives, including customer/stakeholder needs.

ii. Hazardous Waste Facilities Section Annual Goal:

Encourage and maintain a highly trained professional staff.

Measures:

- a. Identify staff training needs as they develop and find, recognizing budget constraints, a way to address them.
- b. Increase skills and abilities of staff.

iii. Commercial/Federal Facilities Section Annual Goals:

Adequately train staff to do their job effectively.

Measures:

- a. Identify staff training needs that are mandatory, critical, or useful.
- b. Identify training opportunities that meet "a." above, as they become available and as resources allow.

Provide the opportunity for staff members to participate in flexible work schedules, telecommuting, and exercise time to help maintain individual staff ability to function at their fullest potential.

Measure:

Provide the opportunity for section staff to telecommute and work flexible schedules while maintaining office coverage and completing section goals.

Conduct section staff meetings as needed.

Measures:

- a. Keep staff informed of C/FF issues.
- b. Keep staff informed of proposed/new rules.
- c. Provide opportunity to discuss C/FF deadlines, problems, and accomplishments.
- d. Provide advance notice to new changes or procedures.

iv. Chem Demil Section Annual Goals:
Successful, professional staff. Properly trained.

Measures:

- a. Identification of mandatory, critical, and useful training needs.
- b. Identification of training opportunities to meet needs.
- c. Development of training courses where none are available.
- d. Tracking of training achievements for section personnel.
- e. Staff understand DEQ/DSHW goals and objectives.

Committed and productive staff.

Measures:

- a. Staff works well together and recognizes the value of teamwork.
- b. Staff complies with rules and policies of State employment.
- c. Staff recognized for their quality work and accomplishments.

v. Used Oil Section Annual Goals:
Develop and maintain appropriate staff expertise to accomplish assigned tasks and assist customers needs. Review and determine staff training needs and opportunities.

Measure:

Identify staff training needs and determine if training is available or being offered during the fiscal year.

Subject to budget restraints and availability of specific training courses and classes, obtain training for employees.

Measure:

Name and number of employees attending training will be maintained.

Recognize employees for quality work. Implement employee quality recognition tools.

Measure:

Number of employee quality recognition tools awarded (incentive awards, on-the-spots awards, administrative leave, etc.)

vi. Solid Waste Section Annual Goals:

Have a trained staff to assist all customers.

Define staff training needs.

Measure:

Training needs document prepared by August 15, 2005.

Subject to budget restraints, obtain training defined in the training needs document.

Measure:

List training received.

ENHANCE POLICY MAKERS' (LEGISLATURE, OTHER ELECTED OFFICIALS, AND BOARDS) UNDERSTANDING OF ENVIRONMENTAL ISSUES

Facilitate policy makers as pro-active participants in shaping environmental policy.

Measures:

1. Legislators, other elected officials, and Board members are apprized of important environmental policy issues.
2. Relationships with policy makers are developed and understanding of environmental issues enhanced.
3. Policy makers work with DSHW in development and implementation of relevant waste management programs environmental policy issues.
4. Policy makers' trust in DSHW is developed and enhanced.

DSHW INDIVIDUAL SECTION ANNUAL GOALS:

i. Hazardous Waste Facilities Section Goal:

Develop partnerships and maintain good lines of communication with policy makers.

Measures:

- a. Keep policy makers informed on program issues that require policy development.
- b. As requested, participate in policy development.

ii. Commercial/Federal Facilities Section Annual Goal:

As requested, provide up-to-date information to Board Members and elected officials on issues dealing with C/FF.

Measures:

- a. Provide required information for the Board packets as required by the Division and within the required time frames.
- b. The staff will participate in Board meetings where issues related to their assigned facilities are discussed.
- c. Provide information as requested and in a timely manner to all elected officials on C/FF issues as requested.
- d. Provide information that will be placed on the Web for facilities, permits, board issues, etc.. Keep the Division Web site updated and readily accessible to board members, elected officials, facilities, and the general public.

iii. Used Oil Section Annual Goals:

To enhance Board members and Legislators understanding of the used oil program by providing them with necessary information to make informed decisions.

Provide educational, rulemaking and enforcement information to the Board in the form of documents and presentations to keep members informed and updated on recent activities within the section.

Measures:

- a. Printed material will be provided in a timely manner to the appropriate secretarial staff to meet the Board mailings.
- b. All material provided to the members will be accurate, grammatically correct and presented in a professional manner.
- c. When necessary, appeals will be brought to the Board for discussion and action.

Identify and develop legislative issues and initiatives and prepare pertinent briefing packets for the 2006 Legislative session.

Measure:

Legislative needs identified and briefing packets are accurate and complete and prepared in a timely manner.